

Jeff P. Prostok
State Bar No. 16352500
Lynda L. Lankford
State Bar No. 11935020
Dylan T.F. Ross
State Bar No. 24104435
FORSHEY & PROSTOK LLP
777 Main St., Suite 1550
Fort Worth, TX 76102
Telephone: 817-877-8855
Facsimile: 817-877-4151
jprostok@forsheyprostok.com
llankford@forsheyprostok.com
dross@forsheyprostok.com

PROPOSED ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 11 Cases
)	
INSTAPAY FLEXIBLE, LLC,)	Case No. 21-42214-11
)	
FLEXIBLE FUNDING LTD. LIABILITY CO.,)	
)	Case No. 21-42215-11
)	
Debtors.)	

**REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN “FIRST DAY” MATTERS**

Instapay Flexible, LLC (“Instapay”) and Flexible Funding Ltd. Liability Co. (“Flexible”, and together with Instapay, the “Debtors”), filed petitions for relief under chapter 11 of the Bankruptcy Code on September 19, 2021. The Debtors request emergency consideration of the following initial case matters (check those that apply):

- X Debtors’ Emergency Motion for Entry of Interim and Final Orders Authorizing the Use of Cash Collateral and Granting Adequate Protection (“Cash Collateral Motion”)
- X Debtors’ Motion for Entry of Order Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure Directing Joint Administration of Cases for Procedural Purposes Only

The Debtors request that an emergency hearing be scheduled on the above matters the afternoon of September 20, 2021, or at such other time and date convenient for the Court. Notice of such emergency hearing will be provided by email to the office of the U.S Trustee and the

Lenders identified in the Cash Collateral Motion, and will be further provided by U.S. first class mail to the other parties identified in the Certificates of Service included with the Motions. Such notice should be sufficient for interim relief, as the parties to be notified are the parties most likely to have an interest in the matters raised by the Motions.

Dated: September 20, 2021.

Respectfully submitted,

/s/ Lynda L. Lankford

Jeff P. Prostok

State Bar No. 16352500

Lynda L. Lankford

State Bar No. 11935020

Dylan T.F. Ross

State Bar No. 24104435

FORSHEY & PROSTOK LLP

777 Main St., Suite 1550

Fort Worth, TX 76102

Telephone: 817-877-8855

Facsimile: 817-877-4151

jprostok@forsheyprostok.com

llankford@forsheyprostok.com

dross@forsheyprostok.com

PROPOSED ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

L:\JPROSTOK\Flexible Funding (C11) #6264\Pleadings\Req for Emergency Consideration - 1st Day Matters 9.20.21.docx